

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1, 4, and 5 are pending. Claims 1, 4, and 5, which are independent, are hereby amended. Support for this amendment is provided throughout the Specification as originally filed. No new matter has been introduced by this amendment. Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §102(e)**

Claims 1, 4 and 5 were rejected under 35 U.S.C. §102(e) as allegedly anticipated by US Publication No. 2002/0164149 to Wilkinson (hereinafter, merely “Wilkinson”).

### **III. RESPONSE TO REJECTIONS**

Claim 1 recites, *inter alia*:

**“...a master file generating means for generating a master file in an audio-visual independent format, the file unit metadata and the frame unit metadata are brought together into one file separately from each other and file names are generated for each of a plurality of video files, the respective audio files of a plurality of channels, a file unit metadata file, a frame unit**

**metadata file, and an auxiliary file, and a link to the file of each file name is generated...” (Emphasis added)**

Support for the above-identified features is at least at paragraphs [0143]-[0145].

The master file generating process is further described in paragraphs [0200]-[0206] and Figure

12. Paragraphs [0143]-[0145] and [0203]-[0205] of the Specification are reproduced below:

[0202] The master file generating process will first be described with reference to the flowchart of FIG. 11.

[0203] When a file in the standard AV format is supplied to and stored in the buffer 31 (FIG. 8), for example, the master file generating process is started. First, in step S1, the master file generating unit 32 (FIG. 8) generates file names of a file unit metadata file, a frame unit metadata file, an auxiliary file, a video file, and an audio file of each channel. The process proceeds to step S2. In step S2, the master file generating unit 32 generates a master file describing a link to the file of each file name generated in step S1 in XML. The master file generating unit 32 supplies the master file to the buffer 44 to store the master file in the buffer 44. Then the master file generating process is ended.

As understood by Applicants, Wilkinson relates to a method and apparatus for combining data with other material. The present invention also relates to a signal processing apparatus arranged to carry out the method, a digital bitstream and a computer program product.

Applicants respectfully submit that Wilkinson fails to teach the above discussed feature of claim 1. Specifically, Wilkinson fails to teach a master file generating means for generating a master file in an AV independent format, where the file unit metadata and the frame unit metadata are brought together into one file separately from each other and file names are generated for each of a plurality of video files, the respective audio files of a plurality of channels, a file unit metadata file, a frame unit metadata file, and an auxiliary file, and a link to the file of each file name is generated, as recited in claim 1.

Therefore, Applicants respectfully submit that claim 1 is patentable.

For reasons similar to those described above with regard to independent claim 1, the independent claims 4 and 5 are also patentable.

**CONCLUSION**

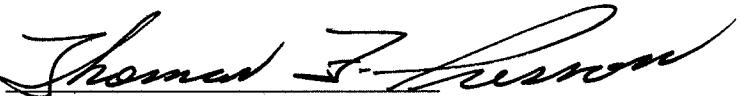
In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate the portion, or portions, of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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